

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Crim. No. 23-1483 MLG

SERAPHINE WARREN-BEGAY, *et al.*,

Defendants.

**JOINT MOTION TO EXTEND
RULE 16 DISCOVERY MOTIONS DEADLINE**

The United States by and through Assistant United States Attorneys Matthew J. McGinley and Elisa C. Dimas, move the Court to extend the Rule 16 Discovery Motions deadline by two (2) weeks, and as grounds state:

1. On December 1, 2023, the Court issued an Order Designating the Case Complex, Continuing Trial and Entered a Scheduling Order. [Doc. 55].
2. The order initially set the Rule 16 discovery motions deadline for February 19, 2024, with responses due on March 4, 2024, and replies due on March 18, 2024. *Id.*
3. A joint motion to Extend Rule 16 Discovery Motions Deadline [Doc. 75] was filed on February 19., 2024, and the Order Granting the Motion [Doc. 77, Text Only] extended the the motions deadline to March 4, 2024, with responses due on March 18, 2024, and replies due on April 1, 2024.
4. Defense counsel and the United States continue to work to identify discovery disputes and resolve them informally. The discovery concerning the recent prosecution of the alleged victim in this matter is undergoing review by the Unites States.
5. The two-week extensions sought will not interfere with any other deadline or the trial

date.

6. Accordingly, the parties respectfully request the Court extend the Rule 16 briefing deadlines by two (2) weeks.

7. If granted, Rule 16 discovery motions would be due on March 18, 2024, with responses due on April 1, 2024, and replies due on April 15, 2024.

8. Counsel for Defendants do not oppose the Motion.

WHEREFORE, the United States' respectfully request this Court enter an order extending the Rule 16 discovery motions deadline to March 18, 2024, with responses due on April 1, 2024, and replies due on April 15, 2024.

Respectfully submitted,

ALEXANDER M. M. UBALLEZ
United States Attorney

Electronically filed on March 4, 2024

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 4, 2024, I filed the foregoing document electronically through the CM/ECF system. Pursuant to the CM/ECF Administrative Procedures Manual, §§ 1(a), 7(b)(2), such filing is the equivalent of service on parties of record.

/s/
MATTHEW J. McGINLEY
Assistant United States Attorney